

**ORIGINAL**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK-----  
UNITED STATES OF AMERICA

- v. -

RUJA IGNATOVA,  
a/k/a "Cryptoqueen,"

Defendant.

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DATE FILED: 10/12/19: **SEALED INDICTMENT**: S1 17 Cr. 630

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**COUNT ONE**  
(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

1. From at least in or about 2014 through in or about 2017, in the Southern District of New York and elsewhere, RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, and others known and unknown, willfully and knowingly, combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and

television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, IGNATOVA, and others working on her behalf, made and caused to be made false statements and misrepresentations soliciting individuals throughout the world, including in the Southern District of New York, to invest in "OneCoin," a purported cryptocurrency, and instructed individuals to transmit investment funds to OneCoin depository accounts, and thereby caused individuals to send international wires representing their OneCoin investments.

(Title 18, United States Code, Section 1349.)

COUNT TWO  
(Wire Fraud)

The Grand Jury further charges:

3. From at least in or about 2014 through in or about 2017, in the Southern District of New York and elsewhere, RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, to wit, IGNATOVA, and

others working on her behalf, made and caused to be made false statements and misrepresentations soliciting individuals throughout the world, including in the Southern District of New York, to invest in "OneCoin," a purported cryptocurrency, and instructed individuals to transmit investment funds to OneCoin depository accounts, and thereby caused individuals to send international wires representing their OneCoin investments.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE  
(Money Laundering Conspiracy)

The Grand Jury further charges:

4. From at least in or about 2014 through in or about 2017, in the Southern District of New York and elsewhere, RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(2)(B)(i).

5. It was a part and an object of the conspiracy that RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, and others known and unknown, knowing that the property involved in certain financial transactions represented proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds

of specified unlawful activity as defined in Title 18, United States Code, Section 1956(c)(7), to wit, the proceeds of the wire fraud scheme alleged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Sections 1343 and 1349, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of these proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit, IGNATOVA, and others working on her behalf, caused the transfer of hundreds of millions of dollars of OneCoin investor funds from OneCoin investment depository accounts through a sophisticated network of bank accounts held at financial institutions located throughout the world, including through bank accounts held at financial institutions located in the United States, and through correspondent banks located in New York, New York, to conceal and disguise the nature, source, ownership, and control of the fraud proceeds.

6. It was further a part and an object of the conspiracy that RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place

in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit, the proceeds of the wire fraud scheme alleged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Sections 1343 and 1349, all in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i), to wit, IGNATOVA, and others working on her behalf, caused the transfer of hundreds of millions of dollars of OneCoin investor funds from OneCoin investment depository accounts through a sophisticated network of bank accounts held at financial institutions located throughout the world, including through bank accounts held at financial institutions located in the United States, and through correspondent banks located in New York, New York, to conceal and disguise the nature, source, ownership, and control of the fraud proceeds.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATIONS

7. As a result of committing the wire fraud offenses alleged in Counts One and Two of this Indictment, RUJA IGNATOVA,

a/k/a "Cryptoqueen," the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offenses.

8. As a result of committing the money laundering offense alleged in Count Three of this Indictment, RUJA IGNATOVA, a/k/a "Cryptoqueen," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in such offense, and any property traceable to such property.

Substitute Asset Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Sections 853; and Title 28, United States Code, Section 2461.)

John D. with  
FOREPERSON

JOON H. KIM  
JOON H. KIM  
Acting United States Attorney  
Southern District of New York

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SOUTHERN DISTRICT OF NEW YORK

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SEALED INDICTMENT

S1 17 Cr. \_\_\_\_\_

(18 U.S.C. §§ 2,  
1343, 1349, and 1956(h).)

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JOON H. KIM  
Acting United States Attorney.

A TRUE BILL

Karen S. Wacht

Foreperson.

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10/12/17 Seneca Indian Nation  
(C) Judge Parker  
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